

With respect to the phrase "more" in claims 1 and 6, paragraph [0098] of the specification, for example, clearly explains that a document version is "more similar" in appearance to the thumbnail than the original document. For example, Fig. 12 shows an original document, and Fig. 13 shows a thumbnail. A document, which is displayed upon request, as shown in Fig. 14, is "more" similar to the thumbnail shown in Fig. 13 than the original document as shown in Fig. 12. This is because of the enhancement "Xerox" that appears in the thumbnail and the displayed document but not in the original document. The phrase "more" emphasizes the fact that the displayed document as shown in Fig. 14 is similar to both the original document and the thumbnail, but "more similar" to the thumbnail than to the original document. Therefore, the phrase "more" is well supported in, and definite in light of, the specification.

Regarding the phrase "substantially" as recited in claims 3 and 8, the word "substantially" means "almost" or "nearly" or possibly "exactly the same." Applicants respectfully submit that the phrase "substantially" is often recited in claims and has been held definite, as discussed in MPEP §2173.05(b) D. In addition, as described in paragraph [0099] of the specification, for example, the document version that is more similar to the original document may actually be identical to the original document. In other words, as discussed during the interview, the displayed document version is very identical in appearance but may contain minute differences and thus may not be exact. Furthermore, the phrase "substantially" is used in the original claim, and therefore is supported by the specification. At least for these reasons, Applicants believe that one of ordinary skill in the art would understand what the phrase "substantially" means in the context of claims 3 and 8.

Withdrawal of the objection is respectfully requested.

The Office Action rejects claims 1-8 under nonstatutory obviousness-type double patenting being unpatentable over claims 1, 4, 16, 20, 21 and 38 of U.S. Patent No. 7,069,506 ('506). Applicants respectfully disagree.

As discussed during the interview, the '506 patent is directed to a method for generating an enhanced thumbnail associated with a document, while the claims of the present application is directed to a method of displaying a document associated with the enhanced thumbnail. Applicants respectfully submit that none of the claims of the '506 patent recites displaying a first version of the original document, at least a portion of the first version corresponding to the enhancement being more similar in visual appearance to a corresponding portion of the thumbnail than a corresponding portion of the original document based on comparison of the at least a portion of the first version to the corresponding portion of the original document and the corresponding portion of the thumbnail, as recited in claim 1 of the present application. Furthermore, this feature would not have been obvious in view of the claims of the '506 patent.

Therefore, claims 1-8 of the present application are patentably distinct from any of the claims of the '506 patent. Accordingly, withdrawal of the rejection is respectfully requested.

The Office Action rejects claims 1-8 under 35 U.S.C. §103(a) over U.S. Patent Publication No. 2002/0091738 to Rohrabough. This rejection is respectfully traversed.

Claim 1 recites, *inter alia*, displaying a first version of the original document, at least a portion of the first version corresponding to the enhancement being more similar in visual appearance to a corresponding portion of the thumbnail than a corresponding portion of the original document based on comparison of the at least a portion of the first version to the corresponding portion of the original document and the corresponding portion of the thumbnail. As discussed above, this feature is shown in Fig. 12-14. Fig. 15 shows a flowchart showing this feature.

As discussed during the interview, Rohrbaugh is directed to displaying a document in different magnifications using SVF (Simple Vector Format) without changing the layout of the document. During the interview, using Figs. 4A-4C of Rohrbaugh, the Examiner explained that Rohrbaugh determines coordinates for each element in a document, and based on the SVF technique, the relationships between the coordinates are maintained such that the document can be accurately zoomed in or out without changing the layout of the document. The Examiner used Figs. 7A and 7B of Rohrbaugh as an example to show this feature of Rohrbaugh and alleged that this feature corresponds to the features recited in claim 1.

However, as discussed during the interview, the document as shown in Fig. 7A (allegedly corresponding to a thumbnail) is only a reduced representation of the original document and does not include an enhancement, such as one shown in Fig. 13 of the present application. During the interview, the Examiner asserted that any element of the document shown in Fig. 7A can be an enhancement, and that such an element is shown in the displayed document shown in Fig. 7B of Rohrbaugh (allegedly corresponding to the first version of the original document).

However, as discussed during the interview, it is Rohrbaugh's invention to not change the layout the document. Thus, the reduced representation shown in Fig. 7A of Rohrbaugh must contain the same layout and information of the original document. Hence the displayed document shown in Fig. 7B of Rohrbaugh, which is an enlarged version of the document shown in Fig. 7A, also contains the same layout and information as the original document. Therefore, all of the original document, the reduced representation of the original document shown in Fig. 7A, and the displayed document shown in Fig. 7B of Rohrbaugh contain the same layout and information.

Thus, in Rohrbaugh, a portion of the displayed document shown in Fig. 7B of Rohrbaugh (allegedly corresponding to a first version of the original document),

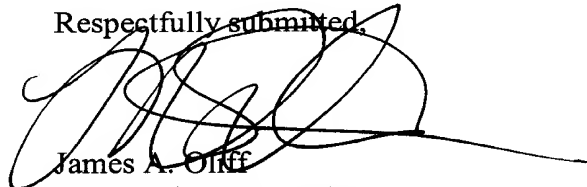
corresponding to the enhancement cannot be more similar in visual appearance to a corresponding portion of the reduced representation shown in Fig. 7A of Rohrbaugh (allegedly corresponding to the thumbnail) than a corresponding portion of the original document, as recited in claim 1.

Therefore, claim 1 is patentable over Rohrbaugh. Claim 6 recites features similar to claim 1 and therefore is patentable over Rohrbaugh. Claims 2-5, 7 and 8 are allowable at least for their dependence on claims 1 and 6, respectively, as well as for the additional features they recite. Accordingly, withdrawal of the rejection is respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of the application are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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